

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 82 05

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Alfredo TRUJILLO

Defendant.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF


21 U.S.C. § 952 and 960

Importation of a Controlled Substance  
(Felony)


The undersigned complainant being duly sworn states:

On or about March 5, 2008, within the Southern District of California, defendant Alfredo TRUJILLO did knowingly and intentionally import approximately 65.54 kilograms (144.19 pounds) of marijuana a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Special Agent  
Immigration and Customs  
Enforcement

Sworn to before me and subscribed in my presence, March 6, 2008.

  
Peter C Lewis  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Alfredo TRUJILLO

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes  
6 furnished to U. S. Immigration and Customs Enforcement Special Agent Behm.

7 On March 5, 2008, at approximately 1845 hours, Alfredo TRUJILLO entered the  
8 United States at the Calexico, California, West, Port of Entry. TRUJILLO was the driver  
9 of a 1995 Chevrolet S-10.

10 Prior to reaching primary inspection, Customs and Border Protection Officer  
11 (CBPO) J. Jones was conducting a pre-primary roving operation with his narcotic  
12 detector dog. The canine alerted to the spare tire of the vehicle. The canine officer  
13 notified CBPO Carp of the alert. TRUJILLO gave a negative oral customs declaration  
14 to CBPO Carp. CBPO Carp escorted TRUJILLO to the vehicle secondary office.

15 A subsequent inspection of the vehicle revealed 30 packages inside all five tires.  
16 One of the packages was probed by CBPO Carp and a sample of a green leafy  
17 substance was obtained, which field tested positive for marijuana. The 30 packages  
18 had a combined net weight of approximately 65.54 kilograms (144.19 pounds).

19 TRUJILLO was placed under arrest and advised of his Miranda Rights, which he  
20 acknowledged and waived. TRUJILLO admitted knowledge of the marijuana in the  
21 vehicle. TRUJILLO stated that he was to be paid \$400.00 to smuggle the marijuana  
22 into the United States, in the form of debt relief.